

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA	§	
	§	
VS.	§	NO. 4:19-CR-786
	§	
ALEXANDRA SMOOTS-THOMAS	§	

**DEFENDANT'S MOTION FOR EXTENSION
OF TIME TO FILE MOTIONS**

TO THE HONORABLE LYNN N. HUGHES, UNITED STATES DISTRICT
JUDGE FOR THE SOUTHERN DISTRICT OF TEXAS, HOUSTON DIVISION:

ALEXANDRA SMOOTS-THOMAS, defendant, by and through her
undersigned counsel, and respectfully moves this Honorable Court for an extension of
time to file motions, and for good cause would show as follows:

I.

Motions in this cause are to be filed no later than November 29, 2019.

II.

Counsel for Defendant requests an extension of time within which to file
motions in this cause. The discovery in this case has not been produced; however
Assistant United States Attorney Ted Imperato has informed counsel that they are
assembling discovery and it will be produced as soon as they are finished. It would
be difficult to file motions for discovery, limine, bill of particulars, suppression,

etc...without first inspecting the discovery. Only upon review of the discovery counsel will be able to determine what, if any, motions need to be filed.

III.

Defendant requests an opportunity to complete the discovery process before terminating the opportunity to file motions. Counsel requests that the motion filing deadline be extended for at least sixty (60) days.

IV.

Counsel for defendant has conferred with AUSA Ted Imperato, who stated the government is unopposed to this request.

V.

This motion is not filed merely for the purposes of delay but so that justice may be done.

WHEREFORE, PREMISES CONSIDERED, the defendant prays this Honorable Court prays that this court grant this motion and extend the filing deadline for all motions for at least sixty (60) days.

Respectfully submitted,

/s/ Kent A. Schaffer

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ALEXANDRA SMOOTS-THOMAS

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CERTIFICATE OF CONFERENCE

Counsel for defendant conferred with AUSA Ted Imperato. Mr. Imperato stated he is unopposed.

/s/ Kent A. Schaffer
KENT A. SCHAFFER

CERTIFICATE OF SERVICE

I hereby certify that on November 20, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to AUSA Ted Imperato.

/s/ Kent A. Schaffer
KENT A. SCHAFFER